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14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 DANIEL ROBBINS,

17 Case No. 2:19-cv-02153-APG-VCF

18 Petitioner,

19 vs.

20 JERRY HOWELL, *et al.*,

21 **UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
RESPONSE TO FIRST AMENDED
PETITION FOR WRIT OF HABEAS
CORPUS (ECF NO. 20)**

22 Respondent(s).

23 **(THIRD REQUEST)**

24 Respondents move this Court for an enlargement of time of 30 days from the current due date of
25 December 2, 2020, up to and including January 4, 2020¹, in which to file their Response to the First
26 Amended Petition for Writ of Habeas Corpus (ECF No. 20). This Motion is made pursuant to Fed. R.Civ.
27 P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel.

28 This is the third enlargement of time sought by Respondents, and the request is brought in good
29 faith and not for the purpose of delay.

30 DATED: December 1, 2020.

31 Submitted by:

32 AARON D. FORD
33 Attorney General

34 By: /s/ Jaimie Stilz
35 Jaimie Stilz (Bar. No. 13772)
36 Deputy Attorney General

37 ¹ 30 days from December 2, 2020 is a holiday – January 1, 2021. Since due dates falling on holidays are
38 moved to the following business day, the Response date would be moved to Monday, January 4.

DECLARATION OF JAIME STILZ

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, JAIME STILZ, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Daniel Robbins v. Jerry Howell, et al.*, Case No. 2:19-cv-02153-APG-VCF, and as such, have personal knowledge of the matters contained herein.

2. This is my third request for an extension to file the Response to Petitioner's First Amended Petition for Writ of Habeas Corpus (ECF No. 20), and the instant Motion is made in good faith and not for the purpose of delay.

3. The Response to the First Amended Petition for Writ of Habeas Corpus (ECF No. 20) is currently due on December 2, 2020.

4. I am unable with due diligence to timely complete the Response herein. My office is still contending with the technological difficulties and issues ensuing from the COVID-19 pandemic, including still working from home as a result of the significant number of cases which are now once more on the rise again. Additionally, I am still attempting to manage severe on-going medical issues. I have been diligently striving to resolve and/or work around these issues but they have significantly impacted my ability to complete the Response in a timely fashion, thus necessitating an extension.

5. In seeking this extension, I am taking into consideration additional obligations and deadlines for both myself and my supervising senior colleague.

6. I have spoken to counsel for Robbins, and she does not oppose this request.

7. Based on the foregoing, I respectfully request an enlargement of time of 30 days, up to and including January 4, 2020, to file the Response to the First Amended Petition for Writ of Habeas Corpus (ECF No. 20).

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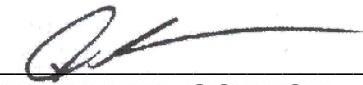
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1 I declare under penalty of perjury that the foregoing is true and correct.
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3 Executed on this 1st day of December, 2020.

4 /s/ Jaimie Stilz
5 Jaimie Stilz (Bar No. 13772)
6 Deputy Attorney General

7 IT IS SO ORDERED:
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9 Dated: December 2, 2020

10 
11 ANDREW P. GORDON
12 UNITED STATES DISTRICT JUDGE
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1 CERTIFICATE OF SERVICE

2 I hereby certify that I am an employee of the Office of the Nevada Attorney General and that on
3 this 2nd day of December, 2020, I served a copy of the foregoing *Unopposed Motion For Enlargement*
4 *Of Time To File Response To First Amended Petition For Writ Of Habeas Corpus (ECF No. 20) (Third*
5 *Request)*, by U.S. District Court CM/ECF electronic filing, to:

6 Lisa A. Rasmussen, Esq.
7 THE LAW OFFICES OF KRISTINA
8 WILDEVELD & ASSOCIATES
9 550 E. Charleston Blvd., Suite A
Las Vegas, NV 89104
Lisa@VeldLaw.com

10 _____
11 /s/ C. Martinez
An employee of the Office of the Attorney General

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